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February 22, 2002

APPLICATION

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Honorable Felix J. Boudreaux
Commissioner of Conservation
P.O., Box 94275
Baton Rouge, LA 70804-9275

RE: Bokenfohr Zone, Reservoir C
13,800' Zone, Reservoir A
Thibodaux Field
Terrebonne and Lafourche Parishes, Louisiana

Dear Commissioner Asprodites:

Application is hereby made on behalf of **POGO PRODUCING COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters in the **Bokenfohr Zone, Reservoir C** and the **13,800' Zone, Reservoir A**, both in the Thibodaux Field, Lafourche and Terrebonne Parishes, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for the exploration for and production of gas and condensate from each of these reservoirs, such units to be designated, respectively, BKNFR RC SUA and 13,800 RA SUA;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate a unit well for each of the proposed units;

4. To designate Pogo Producing Company as the unit operator for the each of the proposed units;
5. To provide that the Commissioner of Conservation should be authorized to reclassify each of the reservoirs by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Bokenfohr Zone in the Thibodaux Field is hereby defined as that certain gas and condensate bearing zone encountered between the depths of 14,596 feet and 14,990 feet, electric log measurements, in the Entex, Inc. - Plater No. 1 Well, located in Section 35, Township 15 South, Range 16 East, Lafourche Parish, Louisiana.

The 13,800' Zone in Thibodaux Field is hereby defined as that certain gas and condensate bearing zone encountered between the depths of 13,768 feet and 14,520 feet, electric log measurements, in the Pan American Petroleum Corp.-Ridgefield Sand Unit No. 1 Well No. 1, located in Section 20, Township 15 South, Range 16 East, Lafourche Parish, Louisiana, and is hereby further defined as that certain gas and condensate bearing zone encountered between the depths of 13,700 feet and 14,464 feet, electric log measurements, in the Placid Oil Co.-E. Boudreaux No. 1 Well, located in Section 79, Township 15 South, Range 16 East, Terrebonne Parish, Louisiana.

A conference to discuss the proposed application and any opposition thereto was held at 1:30 p.m., on Friday, February 15, 2002, at The Howard Johnsons, 201 North Canal Blvd., Thibodaux, LA 70301 (985-447-0971). A list of the parties who attended the pre-application conference is attached. Randall C. Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedures. David Comeaux, geological consultant for the applicant, explained the applicant's proposal and the geological, engineering and other bases therefor, and answered questions. Mr. Charles Smith, representing Adval, Inc., presented counterplans which would move the south unit boundary for each unit slightly further to the south to add acreage. There was some discussion about resolution of differences, but the parties indicated they would talk further after the conference. The conference was then adjourned.

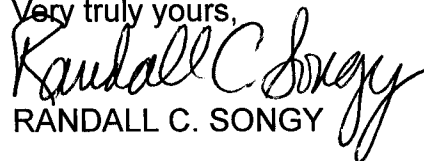
The proposed units attached to this application are identical to those presented by the applicant at the conference. However, the applicant intends to have further discussions with the parties regarding resolution of differences on the south boundary.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting David Comeaux at Leon E. Comeaux & Associates, 305 La Rue France, Lafayette, Louisiana 70508, (337) 233-9839.

There is attached hereto and made a part hereof plats outlining the proposed units and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$1400.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,


RANDALL C. SONGY

RCS/dde/bad
Enclosures

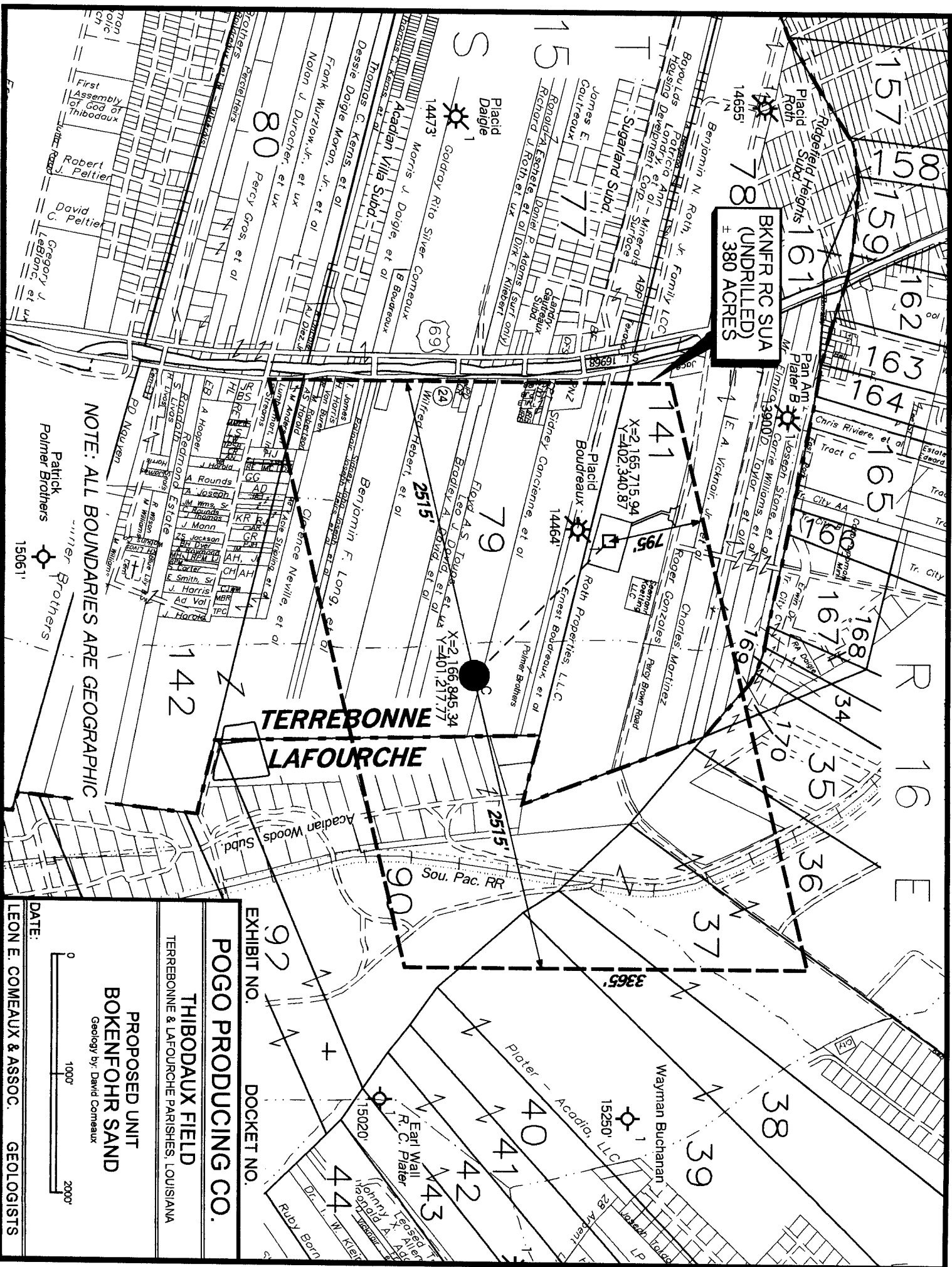
cc: Mr. Richard Hudson, District Manager
Office of Conservation

All Interested Owners, Interested Parties
and Represented Parties

P.S. To all Interested Owners, Represented Parties and Interested Parties:

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed units. In some cases, the area proximate to proposed units can extend as far as one-half mile outside the unit boundary.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.



POGO PRODUCING CO.

EXHIBIT NO.

DOCKET NO.

THIBODAU FIELD
TERREBONNE & LAFOURCHE PARISHES, LOUISIANA

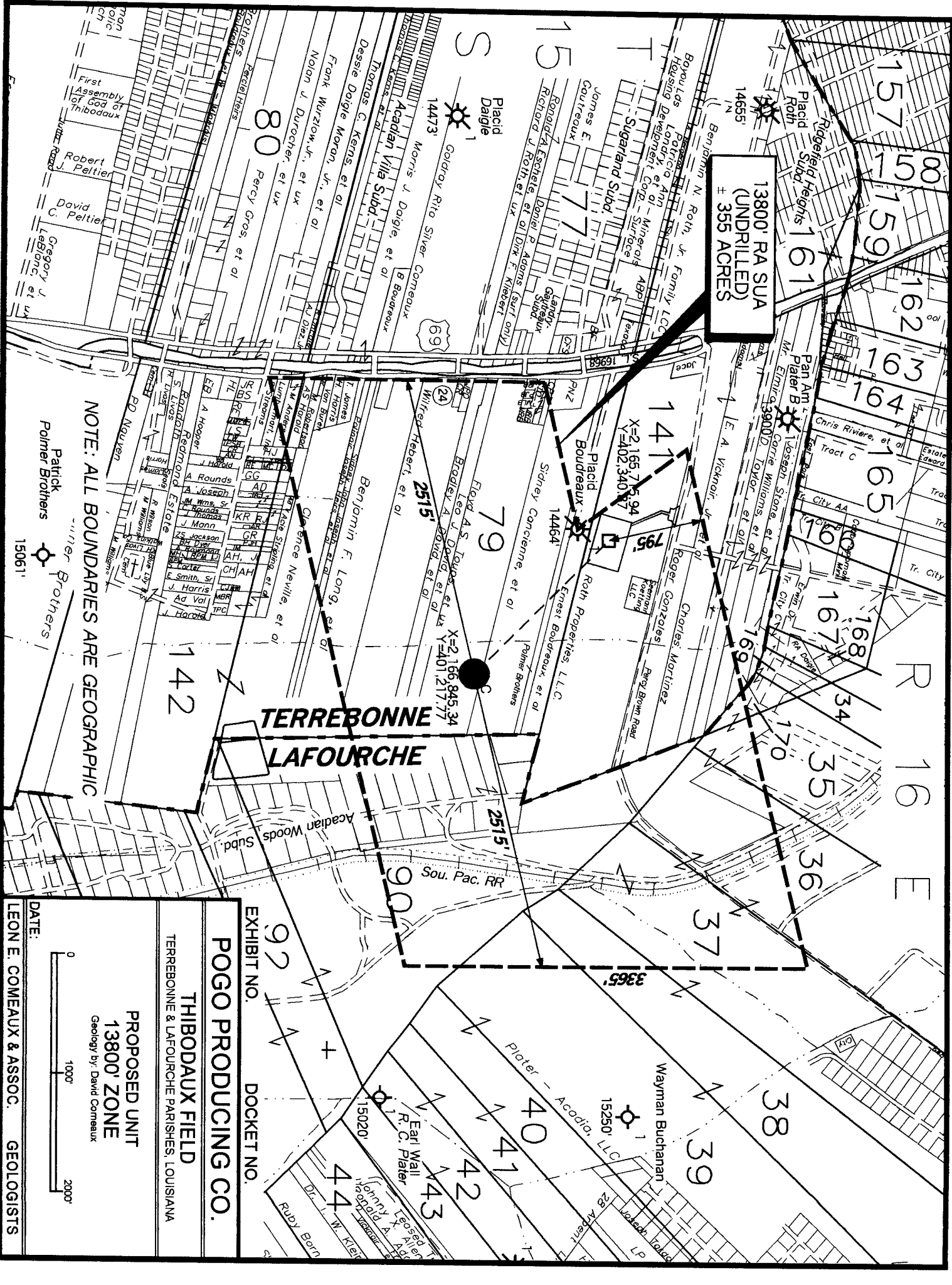
**PROPOSED UNIT
BOKENFOHR SAND**

Geology by: David Comeaux

DATE:

LEON E. COMEAUX & ASSOC.

GEOLOGISTS



13800' RA SUA
(UNDRILLED)
± 355 ACRES

NOTE: ALL BOUNDARIES ARE GEOGRAPHIC

TERREBONNE
LAFOURCHE

POGO PRODUCING CO.

THIBODAUX FIELD
TERREBONNE & LAFOURCHE PARISHES, LOUISIANA

PROPOSED UNIT
13800' ZONE
Geology by David Comeaux

DATE: _____
LEON E. COMEAUX & ASSOC. GEOLOGISTS